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*Mix*  
107.3 FM

To: Secretary  
Federal Communications Commission  
1919 M. Street, N.W.  
Washington, D.C. 20554

Today's Date: January 19, 1995

Re: Comments filed for Docket: MM-Docket No. 94-130

From: Tony Coloff  
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Comments submitted by: Tony Coloff

Part-owner of Pilot Knob Broadcasting, Inc., licensee of KLOW-FM in Forest City, Iowa.

Tony Coloff is also General Manager and Chief Engineer at KLOW.

The opinions expressed and related facts are based on daily observation experience, monitoring KLOW's FM transmitter and associated monitoring equipment, and supervising duty operators of that transmitter.

- a. Methods now being used to comply with the duty operator requirements and how useful compliance has been.

We use a dial up remote control unit, which calls the duty operator at home on the phone if the transmitter is over or under operating parameters.

The duty operator then can call the remote control dial up unit and restore it to operating parameters or shut it down.

At the remote control point, we also have an EBS monitor receiver to receive EBS alerts from the CPSC-1 control station.

The dial up unit has never called in 18 months of operation, because of an out of tolerance condition. The transmitter is extremely stable. (It was new in 1990)

- b. Will licenses exercise due diligence in the absence of duty operator regulations?

Yes, most licensees will exercise due diligence.

However, I believe that in the absence of duty operator regulations, that some licensees, especially some cut-rate competitor licensees, will be encouraged to be negligent and irresponsible.

Being irresponsible has already happened, without an elimination of the duty operator rules.

We have a cut rate competitor in our market, and the station used to be a very responsible EBS control station, and now that station cannot be relied upon to send their weekly EBS test so we can test our EBS receive equipment to make sure it operates.

- c. Should duty operator requirements be eliminated only where ATS is utilized?

No. Duty operator requirements should be eliminated for all stations.

A dial-up remote control unit can alert station personnel to an out of tolerance condition, and allow the personnel to bring the station back into tolerance, before determining that the transmitter has to be taken off the air.

The transmitter should not automatically be taken off the air within 3 minutes, if an out of tolerance operation is not corrected.

- d. Should tower lighting be automatically monitored?

If the tower lights cannot be visually inspected during night hours, they should be checked by a remote control dial-up system during night hours to make sure they are lit.

It is not necessary to automatically monitor the tower lights continuously all night long. This would require turning the monitoring system on and off each time the tower lights are turned on and off.

We do not have a requirement now that requires continuously monitoring tower lights during the night hours.

- e. How will EBS be monitored, logged and responded to?

The new EBS system should be designed to automatically take care of these functions, without duty operator involvement. This would be faster and fail-safe, and a vast improvement over the old EBS system.

- f. Where interference to other stations may result:

Is 3 minutes long enough time before the station is removed from the air?

What problems are remedied if a station is returned to the air for testing, rather than only operating into a dummy load?

How long should a station be allowed to return to the air at any one time, while a malfunction is being corrected?

3 minutes is not long enough to give operators enough time before the station is removed from the air. This should be 7 to 10 minutes.

A dummy load cannot substitute for testing the transmitters ability to operate correctly on the air. The dummy load requirement should be eliminated.

A station should be allowed to return to the air for periods of up to 1 to 2 minutes, at any one time, while transmitter malfunctions are being corrected.

g. Should carrier frequency measurements be included as a monitoring requirement?

Should modulation measurements be included as a monitoring requirement?

Should dial-up monitoring systems be allowed to use non-dedicated lines and, if so, in what circumstances?

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Frequency compliance of the transmitter is very stable, and should not have to be continuously monitored. It should not have to be checked by a remote control. Frequency measurements should be required once a year, or once every 6 months, to make sure the station is operating within the assigned frequency.

Modulation levels are so stable once they are set, that there should be no requirement to continuously monitor modulation levels. They should not have to be checked by remote control.

Modulation levels should be observed visually once in 24 hours to make sure the station is operating within modulation level parameters.

Dial-up remote control unit monitoring systems should be allowed to use non-dedicated lines, where the other usage of the line does not exceed 10% of the nighttime hours from 6pm to 6am.

Any other usage of that line, other than the remote control function, during these times, can easily be terminated to quickly then make use of the line for possible out of tolerance calls from the transmitter, and a return call going into the dial-up remote control system to check and control the transmitter.

However, if that non-dedicated phone line, is a regularly used business or program line during the nighttime hours, it cannot be used for dial-up monitoring systems.

A dedicated line, then, should be required.